

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

DORIS CAMPBELL, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	No. 1:16-cv-04631
v.	)	
	)	
CHARLES A. WHOBREY, <i>et al.</i> ,	)	The Honorable Edmond E. Chang
	)	
Defendants.	)	

**DECLARATION OF AMANDA AMERT IN SUPPORT OF PLAINTIFFS' MOTION  
FOR SUMMARY JUDGMENT AND STATEMENT OF UNDISPUTED FACTS**

I, Amanda Amert, declare as follows:

1. I am an attorney at Jenner & Block LLP, counsel for Plaintiffs in the above-captioned case.
2. I submit this declaration in support of Plaintiffs' Motion for Summary Judgment and Statement of Undisputed Facts.
3. Attached as **Exhibit 1** is a true and correct copy of the full administrative record produced by Defendants in this case (DEF\_CENTRALST\_000001-000526), filed under seal.
4. Attached as **Exhibit 2** is a true and correct copy of section 1.04 of the Central States, Southeast and Southwest Areas Pension Plan document.
5. Attached as **Exhibit 3** is a true and correct copy of the letter dated November 4, 2016 from Defendant Thomas Nyhan to Ken Hoffman.
6. Attached as **Exhibit 4** is a true and correct copy of the Central States, Southeast and Southwest Areas Pension Plan's 2017 IRS Form 5500, Schedule of Expected Payments.

**[SIGNATURE BLOCK ON NEXT PAGE]**

Dated: April 19, 2019

/s/ Amanda S. Amert  
Amanda S. Amert

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*Attorney for Plaintiffs*

CERTIFICATE OF SERVICE

I certify that on April 19, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a Notice of Electronic Filing to all counsel of record.

/s/ Amanda S. Amert  
Amanda S. Amert